APPENDIX D

Defendants Uber Technologies, Inc. and Ottomotto LLC ("Uber") hereby submit their witness list for trial, pursuant to Fed. R. Civ. P. 26(a)(3) and the Court's Guidelines for Trial and Final Pretrial Conference in Civil Jury Cases.

Uber identifies the name, contact information, and substance of the testimony of each witness it expects to present or may present at trial, other than solely for impeachment. Pursuant to the Court's Guidelines, non-cumulative testimony is identified below in italics.

I. LIVE WITNESSES

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Uber expects to present live testimony from the following witnesses:

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9	Witness	Contact Information	Substance of Trial Testimony
10	Boehmke, Scott	[Contact through counsel of record]	Mr. Boehmke is an engineering manager within Uber's Advanced
11			Technologies Group, responsible for hardware development and application
12		Uber Technologies, Inc. Advanced Technologies Center	in the self-driving vehicle project. He was previously a project engineer at
13		100 32nd St, Pittsburgh, PA 15201	Carnegie Mellon where he designed LiDAR and Radar sensors. He may
14		13201	testify regarding design and development of Defendant's LiDAR,
15			Defendant's non-misappropriation of Waymo's trade secrets; inspections
16			pursuant to the Court's provisional remedy order; and confirmation of the
17			absence of evidence of trade secret misappropriation through and during
18			compliance with the Court's provisional remedy order.
19	Epstein, Michael	Waymo LLC 1600 Amphitheatre Parkway	Mr. Epstein is a product manager at Waymo. He is expected to testify
20		Mountain View, CA 94043	regarding Waymo's decision to enter the Transportation as a Service
21			("TaaS") market, estimates and forecasts of the ride-sharing market and
22			Waymo's share of the ride-sharing market and <i>Waymo's business and</i>
23			strategic plans (and plans generally) for the ride-sharing market, including
24			projections for revenue generation and profitability and <i>including TaaS</i> , and
25			competition with Uber.

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1	Witness	Contact Information	Substance of Trial Testimony
2	Faulkner, Kevin	[Contact through counsel of record]	Mr. Faulkner is Managing Director at Stroz Friedberg and is an expert retained by Uber and Ottomotto to
3		Stroz Friedberg	testify regarding the forensic examination of Uber-issued devices and
4		32 Avenue of the Americas, Floor 4	data and confirmation of the absence of evidence of trade secret
5		New York, NY 10013 Phone: (212) 981-6540	misappropriation through and during compliance with the Court's
6		1 Hone. (212) 961-0340	provisional remedy order. He will testify regarding the matters disclosed
7			in his expert report of September 7, 2017.
8 9	Friedberg, Eric	Stroz Friedberg 32 Avenue of the Americas,	Mr. Friedberg is a co-founder of Stroz Friedberg and currently serves as the
10		Floor 4 New York, NY 10013	co-President. He will testify regarding Stroz Friedberg's investigation and due diligence for Uber's potential
11		Phone: (212) 981-6540	acquisition of Ottomotto and Otto Trucking, LLC, including with respect
12			to the deletion of the 14,000 downloaded files.
13 14	Haslim, James	[Contact through counsel of record]	Mr. Haslim is a senior engineering manager at Uber, responsible for the
15		Uber Technologies, Inc.	technical development of Uber's LiDAR sensors, and previously worked at Tyto.
16		1455 Market Street, Floor 4	He may testify regarding design and development of Defendants' LiDAR; Defendants' non-misappropriation of
17		San Francisco, CA 94103	Waymo's trade secrets; knowledge of Odin Wave LLC and Tyto
18			LiDAR LLC; and confirmation of the absence of evidence of trade secret
19			misappropriation through and during compliance with the Court's
20			provisional remedy order.

Defendants Uber and Ottomotto's Fed. R. Civ. P. 26(A)(3) Witness List Case No. 3:17-cv-00939-WHA sf-3823367

1	Witness	Contact Information	Substance of Trial Testimony
2	Kalanick, Travis	[Contact through counsel of record]	Mr Kalanick is Uber's co-founder and former Chief Executive Officer. He
3		Uber Technologies, Inc.	may testify regarding Defendants' business model and strategy for autonomous vehicles; Defendants' non-
4		1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets; Uber's decision to acquire
5		San Francisco, CA 94103	Ottomotto; steps taken by Defendants to prevent trade secrets from prior
6			employers coming to Defendants; Defendants' autonomous vehicle
7			program; March 11, 2016 meeting with Anthony Levandowski; knowledge of
8			Waymo's discussions with Defendants regarding a partnership with
9			Defendants in the self-driving vehicle/ride-sharing space; Defendants'
10			employment of Anthony Levandowski; and Defendants' termination of
11			Anthony Levandowski.
12	Krafcik, John	Waymo LLC 1600 Amphitheatre Parkway	Mr. Krafcik is Waymo's Chief Executive Officer. He is expected to
13		Mountain View, CA 94043	testify regarding development and operation of Waymo's autonomous
14			vehicle program; Anthony Levandowski's departure from Waymo; Wayma's policies surrounding side
15			Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee
16			involvement in side projects and side businesses, including that of Anthony
17			Levandowski; Waymo's business plans; knowledge of discussions with
18			Defendants regarding a partnership with Defendants in the self-driving
19			vehicle/ride-sharing space; and knowledge of the Project Chauffeur
20			bonus program.
21	Lebby, Michael	[Contact through counsel of record]	Dr. Lebby is an expert retained by Uber and Ottomotto to testify regarding non-
22			misappropriation of Waymo's trade secrets. He will testify regarding the matters disclosed in his expert report of
23			September 7, 2017.
24		Email: lebby@usc.edu	
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Witness	Contact Information	Substance of Trial Testimony
McManamon, Paul	[Contact through counsel of record]	Dr. McManamon is an expert retained by Uber and Ottomotto to testify regarding non-misappropriation of
	University of Dayton 300 College Park	Waymo's trade secrets. He will testify regarding the matters disclosed in his
	Fitz Hall Room 580Q Dayton, OH 45469 Phone: (937) 344-3921	expert report of September 7, 2017, and his declaration of April 7, 2017.
Meyhofer, Eric	[Contact through counsel of record]	Mr, Meyhofer is Head of Uber's Advanced Technologies Group. He
	Uber Technologies, Inc.	may testify regarding the design and development of Defendants' LiDAR; Defendants' autonomous vehicle
	Advanced Technologies Center 100 32nd St Pittsburgh, PA 15201	program; Defendants' non- misappropriation of Waymo's trade secrets; Defendants' business model
		and strategy for autonomous vehicles; Uber's decision to acquire Ottomotto;
		termination of Anthony Levandowski; confirmation of the absence of evidence of trade secret misappropriation
		through and during compliance with the Court's provisional remedy order; and
		steps taken by Defendants to prevent trade secrets from prior employers of
		Defendants' employees coming to Defendants.
Nestinger, Stephen	345 Digital Drive Morgan Hill, CA 95037 Phone: (408) 465-2800	Mr. Nestinger is Director of Mechanical Engineering at Velodyne. He is expected to testify regarding the
	Contact through counsel:	technologies in LiDAR sensors that Velodyne has made or sold, including
	John V. Picone III, Esq. Hopkins & Carley	VLP-16, HDL-32E, HDL64E, Puck Hi- Res, and Puck Lite.
	The Letitia Building 70 South First Street	
	San Jose CA 95113 Phone: (408) 286-9800 Email:	
	jpicone@hopkinscarley.com	

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1	Witness	Contact Information	Substance of Trial Testimony
2	Page, Larry	Alphabet Inc. 1600 Amphitheatre Parkway	Mr. Page is Google's co-founder and Chief Executive Office of Google's parent company, Alphabet Inc.
3		Mountain View, CA 94043	He is expected to testify regarding development and operation of
4			Waymo's autonomous vehicle program; Anthony Levandowski's
5			departure from Waymo; Waymo's policies surrounding side projects and
6			side businesses; knowledge of Waymo employee involvement in side projects
7			and side businesses, including that of Anthony Levandowski; Waymo's
8			business plans; knowledge of discussions with Defendants regarding
9			a partnership with Defendants in the self-driving vehicle/ride-sharing space;
10			and knowledge of the Project Chauffeur bonus program, and his concerns about
11			competition from Uber and Anthony Levandowski.
12	Poetzscher, Cam	[Contact through counsel of record]	Mr. Poetzscher is Uber's Vice President of Corporate Development.
13			He may testify regarding Defendants' non-misappropriation of Waymo's
14		Uber Technologies, Inc. 1455 Market Street, Floor 4	trade secrets; business of Otto Trucking LLC; Uber's decision to
15		San Francisco, CA 94103	acquire Ottomotto; Uber's indemnification agreement with
16			Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto
17			and/or Otto Trucking before April 11, 2016; Stroz due diligence for the
18			Uber/Ottomotto acquisition; and confirmation of the absence of evidence
19			of trade secret misappropriation through and during compliance with the
20			Court's provisional remedy order.
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1	Witness	Contact Information	Substance of Trial Testimony
2	Ron, Lior	[Contact through counsel of	Mr. Lior is Senior Director at OttoFreight, was a co-founder of
_		record]	Ottomotto, and previously worked at
3			Google. He may testify regarding the
4		Uber Technologies, Inc.	nature of employment at Waymo and
4		1455 Market Street, Floor 4	Defendants; Anthony Levandowski's departure from Waymo; Waymo's
5		San Francisco, CA 94103	policies surrounding side projects and
			side businesses; knowledge of Waymo
6			employee involvement in side projects
7			and side businesses, including that of Anthony Levandowski; knowledge of
			the Project Chauffeur bonus program;
8			steps taken by Defendants to prevent
9			trade secrets from prior employers of Defendants' employees coming to
			Defendants' employees confing to Defendants' pefendants' non-
10			misappropriation of Waymo's trade
11			secrets; formation, purpose, and
11			business of Otto Trucking LLC; formation, purpose, and business of
12			Ottomotto; Ottomotto's decision to be
13			acquired by Uber; March 11, 2016
13			meeting with Anthony Levandowski; Stroz due diligence for the
14			Uber/Ottomotto acquisition;
1.5			confirmation of the absence of evidence
15			of trade secret misappropriation through and during compliance with the
16			Court's provisional remedy order; and
			design and development of Ottomotto's
17	0 11, 0,		LiDAR.
18	Sullivan, Stacy	Waymo LLC	Ms. Sullivan is Vice President for People Operations and Chief Culture
		1600 Amphitheatre Parkway	Officer at Google. She is expected to
19		Mountain View, CA 94043	testify regarding communication with
20			Larry Page regarding Anthony Levandowski, Mr. Levandowski's
			alleged recruitment of Waymo
21			employees, the Chauffeur bonus plan,
22			friction on the Chauffeur team, a meeting with Anthony Levandowski
22			and Chelsea Bailey after
23			Mr. Levandowksi left Google, the
24			competition for talent, investigation (or
∠ '+			lack thereof) of personal devices of new Google employees, and Larry Page's
25			concerns about competition from
26			Anthony Levandowski.
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1	Witness	Contact Information	Substance of Trial Testimony
2	Urmson, Chris		Mr. Urmson was Waymo's former Chief Technology Officer. He is
2			expected to testify regarding
3			development and operation of
			Waymo's autonomous vehicle
4			program; Anthony Levandowski's
5			departure from Waymo; Waymo's employee policies concerning
5			confidential and trade secret
6			information; Waymo's policies
_			surrounding side projects and side
7			businesses; knowledge of Waymo
8			employee involvement in side projects and side businesses, including that of
			Anthony Levandowski; and knowledge
9			of the Project Chauffeur bonus
10	71 1 0 1		program. Mr. Zbrozek is an electrical hardware
10	Zbrozek, Sasha	Waymo LLC	engineer on Waymo's, and before that,
11		1600 Amphitheatre Parkway	Google's, self-driving car project. He
10		Mountain View, CA 94043	is expected to testify regarding
12			Waymo's measures to protect the
13			security of Waymo's confidential documents, servers, and SVN
			repository; Waymo's employee policies
14			concerning confidential and trade secret
15			information; his development of instructions for logging into the SVN
13			repository and the fact that following
16			his instructions downloads the entire
17			database; that the documents in that
17			database are "low value" and that he was concerned that the lawyers were
18			ascribing suspicion to Anthony
			Levandowski's alleged downloading;
19			and his participation in Waymo's
20			forensic investigation into alleged misappropriation of trade secrets.
20			inisappropriation of trade secrets.

Uber may present live testimony from the following witnesses:

Witness	Contact Information	Trial Testimony
Bailey, Chelsea	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Ms. Bailey is a human resources business partner at Google[x]. She is expected to testify regarding Waymo's policies concerning confidential and trade secret information; Waymo employment and compensation issues; and the Project Chauffeur bonus program.

1	Witness	Contact Information	Trial Testimony
2	Bares, John	[Contact through counsel of	Mr. Bares is the former Operations
2		record]	Director at Uber's Advanced
3		Illian Tankanlanian Ing	Technologies Group. He may testify regarding design and development of
4		Uber Technologies, Inc.	Defendants' LiDAR; Defendants'
4		Advanced Technologies Center 100 32nd St, Pittsburgh, PA	autonomous vehicle program;
5		15201	Defendants' non-misappropriation of
6			Waymo's trade secrets; Defendants' business model and strategy for
7			autonomous vehicles; Uber's decision to acquire Ottomotto; steps taken by
8			Defendants to prevent trade secrets
9			from prior employers of Defendants' employees coming to Defendants; and
10			confirmation of the absence of
			evidence of trade secret misappropriation through and during
11			compliance with the Court's
12			provisional remedy order.
13	Bratic, Walter	[Contact through counsel of	Mr. Bratic is an expert retained by
13		record]	Uber and Ottomotto to testify regarding damages. He will testify
14		OverMont	regarding the matters disclosed in his
15		3737 Buffalo Speedway Suite 1600	expert report of September 7, 2017.
16		Houston, Texas 77098 Phone: (713) 403-3307	
17		Email:	
1 /		walter.bratic@whitleypenn.com	
18	Brin, Sergey	Alphabet Inc.	Mr. Brin is a co-founder of Google and
19		1600 Amphitheatre Parkway Mountain View, CA 94043	President of Google's parent company, Alphabet Inc. He is expected to testify
20		Wiountain View, CA 94043	regarding development and operation
21			of Waymo's autonomous vehicle program; Anthony Levandowski's
21			departure from Waymo; Waymo's
22			policies surrounding side projects and
23			side businesses; and knowledge of
			Waymo employee involvement in side projects and side businesses, including
24			that of Anthony Levandowski.
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1	Witness	Contact Information	Trial Testimony
2	Brown, Gary	Waymo LLC	Mr. Brown is a Forensics Security Engineer at Google. He is expected to
		1600 Amphitheatre Parkway	testify about Waymo's first awareness
3		Mountain View, CA 94043	of alleged trade secret
4			misappropriation; Waymo's forensic
_			investigation into alleged
5			misappropriation of trade secret
6			misappropriation, including the conclusions drawn from that
7			investigation; and Waymo's measures
7			to protect the security of Waymo's
8			confidential documents, servers, and
9	Decimate Deci		SVN repository. Mr. Burnette is a technical lead for
	Burnette, Don	[Contact through counsel of record]	software at Uber, and previously
10		record	worked at Google prior to co-founding
11		Uber Technologies, Inc.	Otto. He may testify regarding the nature of employment at Waymo and
		1455 Market Street, Floor 4	Defendants; Defendants' non-
12		San Francisco, CA 94103	misappropriation of Waymo's trade secrets; formation, purpose, and
13			business of Ottomotto; Ottomotto's
1.4			decision to be acquired by Defendants;
14			Development and operation of Waymo's autonomous vehicle
15			program; Anthony Levandowski's
16			departure from Waymo; Waymo's policies surrounding side projects and
10			side businesses; knowledge of Waymo
17			employee involvement in side projects
18			and side businesses; knowledge of the Project Chauffeur bonus program;
			Stroz due diligence for the
19			Uber/Ottomotto acquisition; and confirmation of the absence of
20			evidence of trade secret
21			misappropriation through and during
21			compliance with the Court's provisional remedy order.
22	Chu, Dan	Waymo LLC	Mr. Chu is Director of Product at
23		1600 Amphitheatre Parkway	Waymo. He is expected to testify regarding estimates and forecasts of the
		Mountain View, CA 94043	ride-sharing market and Waymo's
24			share of the ride-sharing market and
25			Waymo's business and strategic plans (and plans generally) for the ride-
26			sharing market, including projections
26			for revenue generation and profitability and including Transportation as a
27			Service (TaaS), and the creation of
28			documents that analyzed competition with Uber.
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1	Witness	Contact Information	Trial Testimony
2	Dolgov, Dmitri	Waymo LLC	Mr. Dolgov is Vice President of
2		1600 Amphitheatre Parkway	Engineering at Waymo. He is expected to testify regarding design,
3		Mountain View, CA 94043	development, and operation of
			Waymo's LiDAR systems, self-driving
4			car project, and purported trade secrets; Waymo's employee policies
5			concerning confidential and trade
6			secret information; Waymo's policies surrounding side projects and side
7			businesses; knowledge of Waymo employee involvement in side projects
8			and side businesses, including that of Anthony Levandowski; and knowledge
9			of the Project Chauffeur bonus program.
	Droz, Pierre-Yves	Waymo LLC	Mr. Droz is Principal Hardware
10	Dioz, riene rves	1600 Amphitheatre Parkway	Engineer at Waymo, serving as
1.1		Mountain View, CA 94043	technical lead on Waymo's LiDAR
11		Wountain View, CA 94043	project since its inception. He is
12			expected to testify about Waymo's employee policies concerning
12			confidential and trade secret
13			information, including with respect to
14			hardware; the design, development, and operation of Waymo's LiDAR systems,
15			self-driving car project, and purported trade secrets; whether and to what
16			extent the allegedly misappropriated files contain Waymo's alleged trade
17			secrets; Waymo's awareness of the extent to which each of the alleged
18			Waymo trade secrets selected for trial other than trade secret 25, or elements
10			thereof, are known or practiced outside
19			of Waymo; and Waymo's knowledge of Odin Wave.
20	Fidric, Bernard	Waymo LLC	Mr. Fidric is a hardware engineer at
21		1600 Amphitheatre Parkway	<i>Waymo</i> . He is expected to testify
21		Mountain View, CA 94043	regarding design, development, and
22			operation of Waymo's LiDAR systems,
23			self-driving car project, and purported trade secrets and Waymo's employee
24			policies concerning confidential and
- '			trade secret information.
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1	Witness	Contact Information	Trial Tagtimany
1	French, Paul		Trial Testimony Mr. French is an expert retained by
2	Fielicii, Faui	465 California Street	Waymo to testify regarding: (1) the
		Suite 1400	
3		San Francisco, CA 94104	forensic examination of Uber-issued devices and data and confirmation of
4		Phone: 415-321-8206	the absence of evidence of trade secret
4		Email: paul@discovia.com	misappropriation through and during
5			compliance with the Court's
			provisional remedy order and
6			(2) Waymo's forensic investigation of
_			Anthony Levandowski, Radu Raduta,
7			and Sameer Kshirsagar and Waymo's
8			methods to protect its confidential
			information and intellectual property
9			(including trade secrets). He is
10			expected to testify regarding the
10			matters disclosed in his two expert
11			reports of September 14, 2017.
	Fulginiti, Mary	c/o Melanie M. Blunschi	Ms. Fulginiti was a managing director
12		Latham & Watkins LLP	at Stroz Friedberg. She will testify regarding Stroz Friedberg's
10		505 Montgomery Street	investigation and due diligence for
13		Suite 2000	Uber's potential acquisition of
14		San Francisco, California 94111	Ottomotto and Otto Trucking, LLC,
		(415) 391-0600	including with respect to the deletion of
15		,	the 14,000 downloaded files.
1.0	Gardner, John	c/o Rogers Joseph O'Donnell	Mr. Gardner is an attorney at Donahue Fitzgerald. He is expected to testify
16		311 California Street, 10th	regarding representation of Anthony
17		Floor	Levandowski; knowledge of Odin
- '		San Francisco, CA	Wave LLC, Tyto LiDAR LLC, and
18			Sandstone Group LLC; and Stroz due
10			diligence for the Uber/Ottomotto acquisition.
19	Gassend, Blaise	Waymo LLC	Mr. Gassend is a software engineer at
20	Gussena, Braise	1600 Amphitheatre Parkway	Waymo. He is expected to testify
		-	regarding design, development, and
21		Mountain View, CA 94043	operation of Waymo's LiDAR systems,
22			self-driving car project, and purported
22			trade secrets and Waymo's employee
23			policies concerning confidential and
			trade secret information.
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1	Witness	Contact Information	Trial Testimony
2	Grossman, William	Waymo LLC	Mr. Grossman is a mechanical
2		1600 Amphitheatre Parkway	engineer at Waymo. He is expected to
3		Mountain View, CA 94043	testify regarding Waymo's knowledge
			of Defendants' LiDAR design;
4			Waymo's employee policies
5			concerning confidential and trade secret information; and Waymo's
5			receipt of correspondence containing
6			Defendants' LiDAR design.
_	Gruver, Dan	[Contact through counsel of	Mr. Gruver is a senior program
7		record]	manager at Uber, responsible for
8			sensing systems for self-driving vehicle,
Ü		Uber Technologies, Inc.	and was formerly employed by Google.
9		1455 Market Street, Floor 4	He may testify regarding the design
10		San Francisco, CA 94103	and development of Defendants'
10		~ 1	LiDAR; Defendants' non-
11			misappropriation of Waymo's trade
			secrets; nature of employment at
12			Waymo; Waymo's employee policies
13			concerning confidential and trade
13			secret information, including with
14			respect to hardware; knowledge of the Project Chauffeur bonus program; and
1.5			confirmation of the absence of
15			evidence of trade secret
16			misappropriation through and during
			compliance with the Court's
17			provisional remedy order.
18	Gudjunsson,	Waymo LLC	Mr. Gudjunsson is Manager of Digital
10	Kristinn	1600 Amphitheatre Parkway	Forensics and Incident Management at Google. He is expected to testify
19		Mountain View, CA 94043	regarding Waymo's measures to
20			protect the security of Waymo's
20			confidential documents, servers, and
21			SVN repository; Waymo's employee policies concerning confidential and
			trade secret information; and Waymo's
22			forensic investigation into alleged
23			misappropriation of trade secret
			misappropriation, <i>including his role in the investigation</i> and the conclusions
24			drawn from that investigation.
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Defendants Uber and Ottomotto's Fed. R. Civ. P. 26(A)(3) Witness List Case No. 3:17-cv-00939-WHA sf-3823367

1	Witness	Contact Information	Trial Testimony
2	Hesselink,	Spilker Building, Room 301	Dr. Hesselink is an expert retained by
2	Lambertus	Stanford University	Waymo to testify regarding Defendants' alleged misappropriation
3		Stanford, California 94305	of Waymo's trade secrets. He is
		Phone: 415-269-7102	expected to testify regarding the
4		Email: Bert@kaos.stanford.edu	matters disclosed in his expert reports
_			of August 24, 2017, and
5			September 14, 2017, and his
6	Holden, Jeff	[Contact through council of	declaration of September 5, 2017. Mr. Holden is Chief Product Officer at
	Holden, Jen	[Contact through counsel of record]	Uber, responsible for product
7		record	development. He may testify regarding
0		Liber Technologies Inc	defendants' business model and
8		Uber Technologies, Inc.	strategy for autonomous vehicles;
9		1455 Market Street, Floor 4	Defendants' autonomous vehicle program; Uber's decision to acquire
		San Francisco, CA 94103	Ottomotto; and confirmation of the
10			absence of evidence of trade secret
1 1			misappropriation through and during
11			compliance with the Court's
12	Ingram, Ben	Warrang LLC	provisional remedy order. Mr. Ingram is a systems engineer at
	Ingrain, Den	Waymo LLC	Waymo. He is expected to testify
13		1600 Amphitheatre Parkway	regarding the design, development, and
1.4		Mountain View, CA 94043	operation of Waymo's LiDAR systems,
14			self-driving car project, and purported
15			trade secrets; Waymo's employee
			policies concerning confidential and
16			trade secret information; and Waymo's
17			awareness of the extent to which
1 /			alleged Waymo trade secret 25, or
18			elements thereof, is known or practiced
			outside of Waymo.
19	Janosko, Michael	Waymo LLC	Mr. Janosko is a Security Engineering
20		1600 Amphitheatre Parkway	Manager at Google. He is expected to
20		Mountain View, CA 94043	testify regarding Waymo's measures to
21			protect the security of Waymo's confidential documents, servers, and
			SVN repository and Waymo's
22			employee policies concerning
23			confidential and trade secret
دے			information.
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1	Witness	Contact Information	Trial Testimony
2	Juelsgaard, Soren	[Contact through counsel of record]	Mr. Juelshaard is a senior engineer at Uber and previously worked at
3		Uber Technologies, Inc.	510 Systems. He may testify regarding Stroz due diligence for the
4		1455 Market Street, Floor 4	Uber/Ottomotto acquisition; Defendants' non-misappropriation of
5		San Francisco, CA 94103	Waymo's trade secrets; and confirmation of the absence of
6			evidence of trade secret
7			misappropriation through and during compliance with the Court's
8	Kim, Rudy	Morrison & Foerster LLP	provisional remedy order. Mr. Kim is a partner at Morrison &
9		755 Page Mill Road	Foerster LLP. He may testify regarding the intellectual property due
10		Palo Alto, CA 94304 Phone: (650) 813-5600	diligence for the Uber/Ottomotto acquisition and inspection pursuant to
11			the Court's provisional remedy order.
12	Kintz, Gregory		Mr. Kintz is an expert retained by Waymo to testify regarding
13			Defendants' alleged misappropriation of Waymo's trade secrets. He is
14			expected to testify regarding the matters disclosed in his declarations of
15 16			March 10, 2017, and April 21, 2017.
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1	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	Contact Information	Twick Tooking over
1	Witness Levandowski,		Trial Testimony Mr. Levandowski was former Vice
2	Anthony	Contact through counsel:	President of Engineering at Uber,
2	7 minony	Ismail Damaey on Miles Ehrlich	co-founder of Ottomotto, and founder
3		Ismail Ramsey or Miles Ehrlich	of 510 Systems. He was also formerly
4		Ramsey & Ehrlich LLP 803 Hearst Avenue	employed by Waymo. He is expected to
-			testify regarding the nature of his
5		Berkeley, CA 94710	employment at Waymo and
_			Defendants; design and development of
6			Defendants' LiDAR; Defendants'
7			autonomous vehicle program;
			Defendants' non-misappropriation of
8			Waymo's trade secrets; business of
9			Otto Trucking LLC; knowledge of Odin Wave LLC and Tyto
			LiDAR LLC; Waymo's employee
10			policies concerning confidential and
11			trade secret information, including with
11			respect to hardware; knowledge of the
12			Project Chauffeur bonus program;
10			March 11, 2016 meeting with Anthony
13			Levandowski; and Stroz due diligence
14	*		for the Uber/Ottomotto acquisition.
	Linaval, Asheem	[Contact through counsel of	Mr. Linaval is an electrical engineer at Uber and previously worked at
15		record]	510 Systems, Google, Odin Wave, and
16		I lhan Tashnalasias Inc	Tyto. He may testify regarding
10		Uber Technologies, Inc. 1455 Market Street, Floor 4	Defendants' autonomous vehicle
17		San Francisco, CA 94103	program and confirmation of the absence of evidence of trade secret
10		San Francisco, CA 94103	misappropriation through and during
18			compliance with the Court's
19	McCann, William	W. II.G	provisional remedy order.
20	McCann, william	Waymo LLC	Mr. McCann is a mechanical engineer at Waymo. He is expected to testify
20		1600 Amphitheatre Parkway	regarding design, development, and
21		Mountain View, CA 94043	operation of Waymo's LiDAR systems,
			self-driving car project, and purported
22			trade secrets; and Waymo's employee
23			policies concerning confidential and
23			trade secret information.
24	Medford, Ron	Waymo LLC	Mr. Medford is Waymo's Director for
25		1600 Amphitheatre Parkway	Safety. He is expected to testify regarding safety assessments, public
۷3		Mountain View, CA 94043	policy, and regulatory work relating to
26			autonomous vehicles, and involvement
27			in safety-related matters.
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1	Witness Margan Phian	Contact Information	Trial Testimony Ms. Rhian is the Team Engagement
2	Morgan, Rhian	[Contact through counsel of record]	Coordinator at Uber and was formerly
		record	the human resources lead at Ottomotto.
3		Uber Technologies, Inc.	She may testify regarding hiring and
4		1455 Market Street, Floor 4	onboarding process for Uber and Ottomotto, including hiring
•		San Francisco, CA 94103	agreements; steps taken by Defendants
5		Sun Tuneisco, Cris 1103	to prevent trade secrets from prior
6			employers of Defendants' employees coming to Defendants; and
O			confirmation of the absence of
7			evidence of trade secret
8			misappropriation through and during
0			compliance with the Court's provisional remedy order.
9	Morriss, Zachary	Waymo LLC	Mr. Morriss is a mechanical engineer
10		1600 Amphitheatre Parkway	at Waymo and previously worked at
10		Mountain View, CA 94043	Anthony's Robots. He is expected to
11			testify regarding Waymo's employee
12			policies concerning confidential and trade secret information; and the
12			design, development, and operation of
13			Waymo's LiDAR systems, self-driving
14			car project, and purported trade secrets.
14	Padilla, Angela	[Contact through counsel of	Ms. Padilla is Associate General
15		record]	Counsel for Litigation and Employment
16			at Uber. She may testify regarding the termination of Anthony Levandowski;
10		Uber Technologies, Inc.	Stroz due diligence for the
17		1455 Market Street, Floor 4	Uber/Ottomotto acquisition;
18		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret
10			misappropriation through and during
19			compliance with the Court's
20			provisional remedy order; and Anthony Levandowski's claim that he
20			downloaded and retained alleged
21			misappropriated materials to facilitate
22	Palomar, Matthew	[Contact through counsel of	bonus payment(s) from Waymo. Mr. Palomar is a hardware engineer at
44	i aioiiiai, mattiiow	[Contact through counsel of record]	Uber and was previously an engineer
23			at Tyto. He may testify regarding the
24		Uber Technologies, Inc.	design and development of Defendants' LiDAR; Defendants' non-
∠ +		1455 Market Street, Floor 4	misappropriation of Waymo's trade
25		San Francisco, CA 94103	secrets; and confirmation of the
26			absence of evidence of trade secret misappropriation through and during
۷٥			compliance with the Court's
27			provisional remedy order.

1	Witness	Contact Information	Trial Testimony
2	Pennecot, Gaetan	[Contact through counsel of	Mr. Pennecot is a hardware engineer
2		record]	at Uber. He formerly worked as a hardware engineer at 510 Systems and
3			Google. He may testify regarding the
		Uber Technologies, Inc.	design and development of Defendants'
4		1455 Market Street, Floor 4	LiDAR; Defendants'
5		San Francisco, CA 94103	non-misappropriation of Waymo's
6			trade secrets; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade
			secret information, including with
7			respect to hardware; knowledge of the Project Chauffeur bonus program; and
8			confirmation of the absence of
			evidence of trade secret
9			misappropriation through and during
10			compliance with the Court's provisional remedy order.
- 0	Qi, Nina	[Contact through counsel of	Ms. Qi is the former Senior Manager of
11	(21, 1 1111111	record]	Corporate Development at Uber. She
12			may testify regarding defendants' non-
12		Uber Technologies, Inc.	misappropriation of Waymo's trade secrets; business of Otto
13		1455 Market Street, Floor 4	Trucking LLC; Uber's decision to
		San Francisco, CA 94103	acquire Ottomotto; March 11, 2016
14		,	meeting with Anthony Levandowski;
15			and confirmation of the absence of evidence of trade secret
			misappropriation through and during
16			compliance with the Court's
17	0.1 0.1		provisional remedy order.
18	Sebern, Colin	[Contact through counsel of record]	Mr. Sebern works on vehicle-building and calibration at Uber and previously worked at Ottomotto and Google. He
19		Uber Technologies, Inc.	may testify regarding Stroz due diligence for the Uber/Ottomotto
20		1455 Market Street, Floor 4	acquisition; Defendants' non- misappropriation of Waymo's trade
		San Francisco, CA 94103	secrets; and confirmation of the
21			absence of evidence of trade secret
22			misappropriation through and during compliance with the Court's
			provisional remedy order.
23	Stojanowski, Ognen	[Contact through counsel of	Mr. Stojanowski is Head of Policy and
24		record]	Government Relations at Uber. He
-			may testify regarding knowledge of Odin Wave LLC, Tyto LiDAR LLC,
25		Uber Technologies, Inc.	and Sandstone Group LLC, and
26		1455 Market Street, Floor 4	confirmation of the absence of
26		San Francisco, CA 94103	evidence of trade secret misappropriation through and during
27			compliance with the Court's
20			provisional remedy order.
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1	Witness	Contact Information	Trial Testimony
2	Suhr, Justin	[Contact through counsel of record]	Mr. Suhr is a Legal Director at Uber, specializing in employment issues. He may testify regarding Stroz due
3		Uber Technologies, Inc.	diligence for the Uber/Ottomotto acquisition; Uber's decision to acquire
4		1455 Market Street, Floor 4	Ottomotto and structure of the acquisition; and confirmation of the
5		San Francisco, CA 94103	absence of evidence of trade secret misappropriation through and during
6			compliance with the Court's provisional remedy order.
7	Tate, Eric	Morrison & Foerster LLP 425 Market Street	Mr. Tate is a partner at Morrison & Foerster LLP. He may testify
8		San Francisco, CA 94105 Phone: (415) 268-7000	regarding the Stroz due diligence for the Uber/Ottomotto acquisition* and
9		Thone. (413) 200 7000	confirmation of the absence of evidence of trade secret
10			misappropriation through and during compliance with the Court's
11			provisional remedy order.
12	Thrun, Sebastian		Mr. Thrun is Chief Executive Officer of Kitty Hawk Corporation and formerly
13		Contact through counsel:	head of Waymo and Google[x]. He is expected to testify regarding
14		Christopher B. Hockett Davis Polk & Wardwell LLP	development and operation of Waymo's autonomous vehicle
15		1600 El Camino Real Menlo Park, CA 94025	program; Anthony Levandowski's departure from Waymo; Waymo's
16		Phone: (650) 752-2009 Email: chris.hockett@davispolk.com	employee policies concerning confidential and trade secret information; Waymo's policies
17		chiris.nockett@davispoik.com	surrounding side projects and side
18			businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of
19			Anthony Levandowski; knowledge of the Project Chauffeur bonus program,
20			and his introduction of Travis Kalanick to Mr. Levandowski.
21	Ulrich, Drew	Waymo LLC	Mr. Ulrich is a mechanical engineer at
22		1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo, and previously work at 510 Systems. He is expected to testify
23		Woulden view, Crisions	regarding Waymo's employee policies concerning confidential and trade
24			secret information and the design,
25			development, and operation of Waymo's LiDAR systems and self-
26			driving car project.
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Witness	Contact Information	Trial Testimony
Wachter, Luke	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Mr. Wachter is a software engineer at Waymo and previously worked at 510 Systems. He is expected to testify regarding the design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets and Waymo's employee policies concerning confidential and trade secret information.
Willis, Tim	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Mr. Willis is Head of Global Supply at Waymo. He is expected to testify regarding Waymo's supply chain operations and Waymo's employee policies concerning confidential and trade secret information.

Uber reserves the right to call any witness identified by Waymo. The above descriptions are not intended to cover every possible topic or sub-topic on which these witnesses may testify and are made without prejudice to Uber eliciting other testimony, including without limitation testimony regarding matters addressed during the deposition of a given witness.

II. DEPOSITION TESTIMONY

Uber reserves the right to present the deposition testimony of Waymo's managing agents and 30(b)(6) designees (i.e., Gary Brown, Pierre-Yves Droz, Dmitri Dolgov, Michael Xing, Joanne Chin, David Lawee, Jennifer Haroon, Ben Ingram, and Aslan (Shawn) Bananzadeh), in addition to or in lieu of their live testimony. Uber also reserves the right to present the deposition testimony of any witnesses listed above to the extent permitted by Federal Rule of Civil Procedure 32.

Uber may present testimony from the following additional witnesses by deposition:

1	Witness	Contact Information	Trial Testimony
1	Bares, John	[Contact through counsel of	Mr. Bares is the former Operations
2		record]	Director at Uber's Advanced
3		-	Technologies Group. Uber may present
3		Uber Technologies, Inc.	his deposition testimony regarding design
4		Advanced Technologies	and development of Defendants' LiDAR;
		Center	Defendants' autonomous vehicle program;
5		100 32nd St, Pittsburgh, PA	Defendants' non-misappropriation of
6		15201	Waymo's trade secrets; Defendants'
Ü			business model and strategy for
7			autonomous vehicles; Uber's decision to acquire Ottomotto; steps taken by
8			Defendants to prevent trade secrets from
0			prior employers of Defendants'
9			employees coming to Defendants; and
1.0			confirmation of the absence of evidence
10			of trade secret misappropriation through
11			and during compliance with the Court's
	7		provisional remedy order.
12	Brin, Sergey	Alphabet Inc.	Mr. Brin is a co-founder of Google and
13		1600 Amphitheatre	President of Google's parent company, Alphabet Inc. Uber may present his
13		Parkway Mayntain View CA 04042	deposition testimony regarding
14		Mountain View, CA 94043	development and operation of Waymo's
15			autonomous vehicle program; Anthony
13			Levandowski's departure from Waymo;
16			Waymo's policies surrounding side
17			projects and side businesses; and
17			knowledge of Waymo employee
18			involvement in side projects and side
			businesses, including that of Anthony
19	Drummond, David	A lash ah at Tara	Levandowski. Mr. Drummond is Senior Vice President
20	Drummond, David	Alphabet Inc.	of Corporate Development at
		1600 Amphitheatre Parkway	Alphabet Inc., Google's parent company,
21		Mountain View, CA 94043	and previously served on Uber's board of
22		, , , , , , , , , , , , , , , , , , , ,	directors while employed by Alphabet Inc.
22			Uber may present his deposition
23			testimony regarding Waymo's knowledge
24			of Defendants' autonomous vehicle
24			program; knowledge of Waymo's
25			discussions with Defendants regarding a partnership with Defendants in the self-
2.5			driving vehicle/ride-sharing space.
26			one of the original space.
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1	Witness	Contact Information	Trial Testimony
2	Page, Larry	Alphabet Inc. 1600 Amphitheatre	Mr. Page is Google's co-founder and Chief Executive Office of Google's parent
3		Parkway Mountain View, CA 94043	company, Alphabet Inc. Uber may present his deposition
4		1120 0110 0111	testimony regarding development and operation of Waymo's autonomous
5			vehicle program; Anthony Levandowski's departure from Waymo; Waymo's
6			policies surrounding side projects and side businesses; knowledge of Waymo
7			employee involvement in side projects
8			and side businesses, including that of Anthony Levandowski; Waymo's
9			business plans; knowledge of discussions with Defendants regarding a partnership
10			with Defendants in the self-driving vehicle/ride-sharing space; and knowledge
11			of the Project Chauffeur bonus program,
12			and his concerns about competition from Uber and Anthony Levandowski.
13	Uber reserves the	ne right to designate testimony	from any witness identified by Waymo.
14	The above descriptions	are not intended to cover every	possible topic or sub-topic on which Uber
15	may offer deposition ex	scerpts and are made without pr	rejudice to Uber offering other testimony.
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Dated: November 17, 2017 MORRISON & FOERSTER LLP

By: <u>/s/ Arturo J. González</u>
ARTURO J. GONZÁLEZ

21 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
22 and OTTOMOTTO LLC

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